

UNITED STATES DISTRICT COURT JUDGE KENNELLY  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MAGISTRATE JUDGE VALDEZ

06CR 0507

UNITED STATES OF AMERICA )

No.

vs. )

Violation: Title 18, United States

Code, Section 1001(a)(2)

JULIE HARRIS )

FILED

COUNT ONE

JN JUL 12 2006

The SPECIAL SEPTEMBER 2005 GRAND JURY charges:

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

1. At times material to this indictment:

a. The United States Department of Housing and Urban Development ("HUD") funded a Housing Choice Voucher ("HCV") program to assist eligible families in obtaining decent, safe and sanitary housing. HCV benefits included assistance in paying expenses for rent and utilities.

b. In Chicago, Illinois, the HCV program was administered by CHAC, Inc., a private company operating under contract with the Chicago Housing Authority.

c. To enroll in the HCV program, individuals and families were required to submit an application demonstrating, among other factors, that their household income fell below certain thresholds for the Chicago metropolitan area. To remain in the program, participants were required to complete annually an Application for Continued Occupancy which required participants to list household incomes. The Applications for Continued Occupancy were submitted to CHAC, Inc. and the application forms stated that "false statements or information are punishable under Federal Law."

2. On or about October 8, 2001, at Chicago, in the Northern District of Illinois, Eastern Division,

JULIE HARRIS,

defendant herein, knowingly and willfully did make a false, fictitious, and fraudulent statement, representation, and omission of a material fact in a matter within the jurisdiction of HUD, an agency of the United States government, in that defendant falsely represented in an Application for Continued Occupancy that no member of her household was employed, when in fact, as defendant then and there knew, she was employed by Walsh Construction Company, and earned wages of approximately \$28,563;

In violation of Title 18, United States Code, Section 1001(a)(2).

**COUNT TWO**

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are hereby realleged and incorporated as if fully set forth herein.

2. On or about September 13, 2002, at Chicago, in the Northern District of Illinois, Eastern Division,

JULIE HARRIS,

defendant herein, knowingly and willfully did make a false, fictitious, and fraudulent statement, representation, and omission of a material fact in a matter within the jurisdiction of HUD, an agency of the United States government, in that defendant falsely represented in an Application for Continued Occupancy that no member of her household was employed, when in fact, as defendant then and there knew, she was employed by Walsh Construction Company, and earned wages of approximately \$27,195;

In violation of Title 18, United States Code, Section 1001(a)(2).

**COUNT THREE**

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are hereby realleged and incorporated as if fully set forth herein.

2. On or about September 15, 2003, at Chicago, in the Northern District of Illinois, Eastern Division,

JULIE HARRIS,

defendant herein, knowingly and willfully did make a false, fictitious, and fraudulent statement, representation, and omission of a material fact in a matter within the jurisdiction of HUD, an agency of the United States government, in that defendant falsely represented in an Application for Continued Occupancy that no member of her household was employed, when in fact, as defendant then and there knew, she was employed by Walsh Construction Company and EA Cox Construction Company, and earned total wages of approximately \$47,831;

In violation of Title 18, United States Code, Section 1001(a)(2).

**COUNT FOUR**

The SPECIAL SEPTEMBER 2005 GRAND JURY further charges:

1. The allegations in paragraph 1 of Count One of this indictment are hereby realleged and incorporated as if fully set forth herein.

2. On or about September 23, 2004, at Chicago, in the Northern District of Illinois, Eastern Division,

**JULIE HARRIS,**

defendant herein, knowingly and willfully did make a false, fictitious, and fraudulent statement, representation, and omission of a material fact in a matter within the jurisdiction of HUD, an agency of the United States government, in that defendant falsely represented in an Application for Continued Occupancy that no member of her household was employed, when in fact, as defendant then and there knew, she was employed by Walsh Construction Company, EA Cox Construction Company, Lorig Construction Company, and DeGraf Construction Company, and earned total wages of approximately \$22,205;

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
UNITED STATES ATTORNEY